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March 19, 2025

The Honorable Gregory B. Williams  
U.S. District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Unit 26  
Room 6124  
Wilmington, Delaware 19801-3555

**Re: *Bioverse, Inc. v. Bioverse Inc.***  
**Case No. 1:24-cv-01308-GBW**

Dear Judge Williams:

I write on behalf of the Plaintiff, Bioverse, Inc., in the above-captioned matter currently pending before Your Honor. Plaintiff respectfully requests that the Court set a scheduling conference pursuant to Rule 16 of the Federal Rules of Civil Procedure at the Court's earliest convenience.

Plaintiff filed its complaint in this case on December 3, 2024 (D.I. 1), after attempting for months to engage Defendant Bioverse Inc. in an effort to resolve this dispute. Counsel for Defendant first appeared in the case on December 23, 2024, and after a brief agreed extension, Defendant filed its answer to the complaint on January 20, 2025 (D.I. 13).

Since that time, counsel for Plaintiff has attempted to schedule a Rule 26(f) conference with Defendant's counsel to discuss and, if possible, agree upon a schedule that the parties could jointly propose to the Court. However, on February 19, 2025, we were informed by Defendant's current counsel of record that Defendant would be hiring new counsel to handle this matter. On March 11, 2025, we were contacted by Zakari A. Kurtz of Sneakers & Streetwear Legal Services, who informed us that he would be representing Defendant going forward.

Because neither counsel has so far been willing to participate in a discussion about a proposed schedule, and because Plaintiff continues daily to be harmed by Defendant's conduct set forth in the complaint, Plaintiff respectfully requests that the Court set a scheduling conference as soon as possible so that active litigation may commence.



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Respectfully,

*/s/ Arthur G. Connolly, III*

Arthur G. Connolly, III (#2667)

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